

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

IMG WORLDWIDE, INC.,	)	
	)	
Plaintiff,	)	
	)	<b>Case No. 1:10-cv-00794-KMO</b>
vs.	)	
	)	<b>DECLARATION OF</b>
	)	<b>LARRY KENNAN</b>
MATTHEW BALDWIN,	)	
	)	
Defendant.	)	

I, Larry Kennan, hereby declare as follows:

1. I am currently the Director of the National Football League Coaches Association ("NFLCA"), an incorporated entity that provides assistance to coaches in the National Football League ("NFL"). The NFLCA is associated with the National Football League Players Association ("NFLPA"), the union that represents NFL players. I make this declaration of my own personal knowledge.

2. I joined the NFLCA in 1999. I had been a coach in the NFL and other sports organizations, most recently as offensive coordinator of the New England Patriots.

3. The NFLCA maintains a comprehensive database ("Database") of the salaries of coaches in the NFL. The Database lists coaches' names, teams and salary. At any given time, I have between 50% and 70% of all NFL coaches' contract information, including annual salary and length of contractual term. The NFLCA freely shares this Database with coaches and their agents. Coaches' salaries are not secret; they are accessible with a Database password or phone call to me. Coaches' salaries are also the subject of industry press reports and are sometimes reported in mainstream news publications.

4. The NFLCA uses the Database to assist coaches, and their agents, in contract negotiations with NFL clubs. For example, if a defensive line coach is negotiating his contract with the Patriots, his agent may use the NFLCA's Database and other resources (such as speaking with me) to learn what other coaches are making in that same position. Armed with that comparative data, the coach's agent will be able to negotiate a contract aware of the current high and low salaries for that coaching position in the NFL.

5. I know Matt Baldwin, IMG and CAA. Mr. Baldwin has had access to the NFLCA Database for years as have agents employed by CAA and numerous other companies.

I declare under the penalty of perjury that the foregoing is true and accurate.

Executed on April 19, 2010



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LARRY KENNAN